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06/17/2004 03:46 PM

To Artemis.Antipas@CH2M.com
cc Tom.Perina@ch2m.com, Christopher
Lichens/R9/USEPA/US@EPA, Rose
Fong/R9/USEPA/US@EPA, Carl
bcc
Subject Validation Support and Options

Hi Artemis,

The QA Office needs a more concrete description of exactly what you require in terms of validation services for Omega, as well as other sites. Although I understand conceptually what you are requesting, we would like it made specific. This would be a list of the information you would like examined and flagged, as needed. Your lists should cover all anticipated analyses Hill might want on this site, and preferable, any other sites.

With respect to CLP, it is also not clear whether you have looked closely at the CADRE reports, as I am advised that these should provide flags for pretty much all of the areas you requested. My understanding is also that the scope of what CADRE checks and flags will be expanding in the near term and again next year, so if not covered already, these expansions might ensure you get what you need in the future. CADRE is automatically performed on all CLP data packages, but not on any Region 9 Laboratory data. If the current CADRE review does not cover everything you require, please identify what additional review/flagging you feel is necessary.

We need this information so that we can talk to our contractors to find out what the feasibility and costs might be, so we can advise Superfund or manage our ESAT resources, depending on who is identified as performing the validation. The QA Office no longer performs validation itself.

It is not clear to me to what extent these requests are being driven by CH2M Hill and to what extent they are being driven by site needs defined by the EPA RPM. Strictly speaking, it is the RPM who should be requesting the validation services, although I recognize that Hill prepares the RSCC form the QAPP/FSP documents in which these requests are made. It might be good if we could clarify that issue as well.

Opinions differ within the QA Office whether the level of effort will be very comparable to a full fledged validation or more along the line of a Tier 1A forms review. We are also not sure that the summary forms typically provided by the Region 9 laboratory in its data packages would contain all the information required to flag the data as you have suggested. If they do not, we would need to persuade the laboratory that changing their data package format was worth the effort. Otherwise, a validator would have to look into the raw data part of the package to extract the information and we will have started down the road to a Tier 3 review. This also leaves open the question of data deliverables from Corps of Engineers laboratories. These are dictated by Superfund and are not within the control of the QA Office or the Regional Laboratory. Although there are no analyses in this category at Omega that I am aware of, I have been told that Hill has made similar requests for other sites, and I assume that could happen again in the future.

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